

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

|                      |   |                     |
|----------------------|---|---------------------|
| SELENE COMMUNICATION | ) |                     |
| TECHNOLOGIES, LLC,   | ) |                     |
|                      | ) |                     |
| Plaintiff,           | ) |                     |
|                      | ) |                     |
| v.                   | ) | C.A. No. 14-400-LPS |
|                      | ) |                     |
| INTEL CORPORATION,   | ) |                     |
|                      | ) |                     |
| Defendant.           | ) |                     |
|                      | ) |                     |

**STIPULATION OF DISMISSAL OF INTEL CORPORATION  
AND SUBSTITUTION OF MCAFEE, INC.**

Pursuant to Rule 41 of the Federal Rules of Civil Procedure, Plaintiff, Selene Communication Technologies, LLC (“Selene”), Defendant, Intel Corporation (“Intel”), and McAfee, Inc. (“McAfee”) stipulate as follows, subject to the Court’s Order immediately below.

1. Subject to the Court’s Order below, Selene hereby dismisses Intel from this action **without prejudice**.

2. The Complaint filed in the above captioned matter at D.I. 1 is hereby amended to substitute McAfee as the Defendant in place of Intel.

3. The Complaint’s allegations concerning Intel shall be deemed to be directed to McAfee, except that the allegations contained in Paragraph 2 are deemed to be deleted and replaced with a new Paragraph 2, which is as follows:

On information and belief, McAfee is a Delaware corporation with a principal office in Santa Clara, California. Defendant has appointed The Corporation Trust Company, Corporation Trust Center, 1209 Orange St., Wilmington, DE 19801 as its agent for service of process.

4. McAfee shall respond to the Complaint in this action on the later of five (5) business days following the entry of this Stipulation by the Court or July 3, 2014.

5. The caption of this action shall be amended to Selene Communication Technologies, LLC v. McAfee, Inc.

6. The parties otherwise reserve all of their respective rights with respect to substitution of McAfee for Intel as the named Defendant in this action.

Dated: June 20, 2014

BAYARD, PA

/s/ Stephen B. Brauerman

Richard D. Kirk (rk0922)  
Stephen B. Brauerman (sb4952)  
Vanessa R. Tiradentes (vt5725)  
Sara E. Bussiere (sb5725)  
222 Delaware Avenue, Suite 900  
Wilmington, Delaware 19801  
(302) 655-5000  
rkirk@bayardlaw.com  
sbrauerman@bayardlaw.com  
vtiradentes@bayardlaw.com  
sbussiere@bayardlaw.com

*Counsel for Selene Communication  
Technologies, LLC*

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Jack B. Blumenfeld

Jack B. Blumenfeld (No. 1014)  
1201 North Market Street, 16th Floor  
Wilmington, DE 19899-1347  
(302) 658-9200  
jblumenfeld@mnat.com

Of Counsel:

Vernon M. Winters  
SIDLEY AUSTIN LLP  
555 California Street, Suite 2000  
San Francisco, CA 94104  
(415) 772-1200

*(pro hac vice application to be submitted)*

*Counsel for Intel Corporation and McAfee, Inc.*

**SO ORDERED**, this \_\_\_\_ day of \_\_\_\_\_, 2014.

The Honorable Leonard P. Stark  
United States District Judge